

Exhibit D

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WILLIE MCLAURIN

<p>1 MS. MCNULTY: -- answer the question.</p> <p>2 MR. BEAN: So you -- just to be</p> <p>3 clear, you're saying at any time, was he in favor -- at</p> <p>4 -- at the time the list was released -- you're not</p> <p>5 saying in the confines of any executive session</p> <p>6 meeting, what -- what was discussed? It's --</p> <p>7 MS. MCNULTY: Correct.</p> <p>8 MR. BEAN: Okay.</p> <p>9 BY MS. MCNULTY:</p> <p>10 Q. After the report was published, were you in</p> <p>11 favor of releasing the list?</p> <p>12 A. After the report was published, there was a --</p> <p>13 a -- there was a -- a general consensus from our</p> <p>14 trustees at the Executive Committee that the list, as a</p> <p>15 matter of transparency, needed to be released.</p> <p>16 Q. You were not in opposition to that? I mean,</p> <p>17 you were in favor of that, yes?</p> <p>18 A. I was not in opposition to that. My name is</p> <p>19 on the -- on the release.</p> <p>20 Q. Yeah, okay. Well, this is -- I'm going to</p> <p>21 mark as Exhibit 6 Lyell 00185173, which is a tweet.</p> <p>22 (Exhibit No. 6 was marked.)</p> <p>23 BY MS. MCNULTY:</p> <p>24 Q. Sir, I'm going to represent to you -- this is</p> <p>25 a --</p> <p style="text-align: right;">Page 90</p>	<p>1 you maintained a Twitter account; is that right?</p> <p>2 A. I did maintain a personal Twitter account.</p> <p>3 Q. And I think you answered in some written</p> <p>4 discovery that you personally maintained the account?</p> <p>5 In other words, you didn't have a person tweeting for</p> <p>6 you?</p> <p>7 A. Yeah. That -- that's too personal to be</p> <p>8 having other people do that.</p> <p>9 Q. Did you ever, at any time while you were</p> <p>10 interim president, discuss a retraction of the</p> <p>11 statements made about David Sills?</p> <p>12 A. No.</p> <p>13 Q. Okay. I'm going to mark as Exhibit 7 your</p> <p>14 answers to interrogatories.</p> <p>15 (Exhibit No. 7 was marked.)</p> <p>16 MR. BEAN: And they're his</p> <p>17 supplemental responses, just to be clear for the</p> <p>18 record.</p> <p>19 MS. MCNULTY: Thank you.</p> <p>20 MR. BEAN: You're welcome.</p> <p>21 BY MS. MCNULTY:</p> <p>22 Q. Okay. As you flip through the document, have</p> <p>23 you seen this document before?</p> <p>24 A. I have.</p> <p>25 Q. Okay. Did you supply the information that</p> <p style="text-align: right;">Page 92</p>
<p>1 A. Yes. I'm -- I'm sure --</p> <p>2 Q. You sure can.</p> <p>3 A. -- I know what this is, but --</p> <p>4 Q. Yeah.</p> <p>5 A. -- let me make sure. Okay.</p> <p>6 Q. Yeah, okay.</p> <p>7 A. Thank you.</p> <p>8 Q. This is a -- a document that was produced by</p> <p>9 Jennifer Lyell in this case. It's a -- a screenshot of</p> <p>10 -- of a tweet reflecting your joint statement with</p> <p>11 Pastor Slade. It's very small print.</p> <p>12 MR. BEAN: We just saw that earlier,</p> <p>13 right?</p> <p>14 MS. MCNULTY: That's right, yeah.</p> <p>15 BY MS. MCNULTY:</p> <p>16 Q. And you understood that when you would make a</p> <p>17 statement or a joint statement, that it would be</p> <p>18 released by Twitter, right?</p> <p>19 A. My understanding is when we make a joint</p> <p>20 statement, it's going to be released through the</p> <p>21 official Baptist Press. I make no assumptions as to</p> <p>22 who or what will release it in any other venue. I just</p> <p>23 always assume that once it's out there, it's out there,</p> <p>24 whether it's snail mail or electronically.</p> <p>25 Q. And at the time you were interim president,</p> <p style="text-align: right;">Page 91</p>	<p>1 forms the answers to the supplemental interrogatories?</p> <p>2 A. Yes.</p> <p>3 Q. Okay. Or the supplemental answers to the</p> <p>4 interrogatories.</p> <p>5 And if you go to the last page, is your signature</p> <p>6 present? Well, it's page 15, to be exact.</p> <p>7 MR. BEAN: I think it's page 18.</p> <p>8 MS. MCNULTY: Then we're looking at</p> <p>9 different answers. Let me see what the title is on</p> <p>10 this one.</p> <p>11 MR. BEAN: I can give you -- I've got</p> <p>12 an extra copy, if you'd like one.</p> <p>13 MS. MCNULTY: Sure. That'd be great.</p> <p>14 MR. BEAN: So these are the</p> <p>15 supplemental responses.</p> <p>16 MS. MCNULTY: Okay.</p> <p>17 MR. BEAN: Page 18.</p> <p>18 MS. MCNULTY: So I want to be clear</p> <p>19 that --</p> <p>20 MR. BEAN: Okay.</p> <p>21 MS. MCNULTY: -- Exhibit 7 is</p> <p>22 Defendant Willie McLaurin's first supplemental</p> <p>23 responses to Plaintiff's amended first set of</p> <p>24 interrogatories to Defendants.</p> <p>25 BY MS. MCNULTY:</p> <p style="text-align: right;">Page 93</p>